

# EXHIBIT A

**DECLARATION OF BENJAMIN GOLDBERG IN SUPPORT OF MOTION BY  
PUBLIC SCHOOL DISTRICTS FOR AN ORDER ALLOWING THEM TO PROCEED  
WITH A CLASS PROOF OF CLAIM AND CERTIFYING A CLASS**

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the following is true and correct:

1. I am a paralegal at the law firm of Hughes Socol Piers Resnick & Dym.
2. I have located and reviewed the complaints of forty-eight states and Washington D.C. to recover costs they have been forced to incur because of the deceptive production, marketing, and sale of opioids. I was unable to locate the complaints of two states (Nebraska and South Dakota).
3. The complaints of the forty-eight states and Washington D.C. can be located at the following links:

State	Location of Complaint
Alabama	<a href="https://cases.justia.com/federal/district-courts/alabama/almdce/2:2018cv00089/65822/1/0.pdf?ts=1518210817">https://cases.justia.com/federal/district-courts/alabama/almdce/2:2018cv00089/65822/1/0.pdf?ts=1518210817</a>
Alaska	<a href="http://law.alaska.gov/pdf/press/171031-PurdueComplaint.pdf">http://law.alaska.gov/pdf/press/171031-PurdueComplaint.pdf</a>
Arizona	<a href="https://www.azag.gov/sites/default/files/docs/press-releases/2018/filings/Purdue_PL_OSC_Application_Redacted.pdf">https://www.azag.gov/sites/default/files/docs/press-releases/2018/filings/Purdue_PL_OSC_Application_Redacted.pdf</a>
Arkansas	<a href="https://www.law360.com/articles/1024811/attachments/0">https://www.law360.com/articles/1024811/attachments/0</a>
California	<a href="https://oag.ca.gov/system/files/attachments/press-docs/53464758.pdf">https://oag.ca.gov/system/files/attachments/press-docs/53464758.pdf</a>
Colorado	<a href="https://coloradosun.com/wp-">https://coloradosun.com/wp-</a>

	<a href="content/uploads/sites/15/2019/02/Purdue-Pharma-opioids-lawsuit.pdf">content/uploads/sites/15/2019/02/Purdue-Pharma-opioids-lawsuit.pdf</a>
Connecticut	<a href="https://portal.ct.gov/-/media/AG/Press_Releases/2019/Purdue-Amended-Complaint-redacted.pdf?la=en">https://portal.ct.gov/-/media/AG/Press_Releases/2019/Purdue-Amended-Complaint-redacted.pdf?la=en</a>
Delaware	<a href="https://assets.documentcloud.org/documents/4356131/2018-01-19-Final-Opioid-Complaint.pdf">https://assets.documentcloud.org/documents/4356131/2018-01-19-Final-Opioid-Complaint.pdf</a>
District of Columbia	<a href="https://oag.dc.gov/sites/default/files/2019-06/DC-v-Purdue-Redacted-Complaint.pdf">https://oag.dc.gov/sites/default/files/2019-06/DC-v-Purdue-Redacted-Complaint.pdf</a>
Florida	<a href="http://myfloridalegal.com/webfiles.nsf/WF/GWRY-B6KV32/\$file/Amended+Complaint+(Filed).pdf">http://myfloridalegal.com/webfiles.nsf/WF/GWRY-B6KV32/\$file/Amended+Complaint+(Filed).pdf</a>
Georgia	<a href="https://law.georgia.gov/document/publication/opioid-lawsuitcarr-v-manufacturers-and-distributorspdf/download">https://law.georgia.gov/document/publication/opioid-lawsuitcarr-v-manufacturers-and-distributorspdf/download</a>
Hawaii	<a href="https://www.mass.gov/files/documents/2019/09/16/Hawaii%20%281%29_0.pdf">https://www.mass.gov/files/documents/2019/09/16/Hawaii%20%281%29_0.pdf</a>
Idaho	<a href="https://www.mass.gov/files/documents/2019/09/05/ID%20-Complaint_Filed.pdf">https://www.mass.gov/files/documents/2019/09/05/ID%20-Complaint_Filed.pdf</a>
Illinois	<a href="https://news.wttw.com/sites/default/files/article/file-attachments/FS%20Complaint%20at%20Law.pdf">https://news.wttw.com/sites/default/files/article/file-attachments/FS%20Complaint%20at%20Law.pdf</a>
Indiana	<a href="https://www.in.gov/attorneygeneral/files/2018.11.13%20FINAL1%20State%20of%20Indiana%20v%20Purdue%20Complaint%20-%20Unredacted.pdf">https://www.in.gov/attorneygeneral/files/2018.11.13%20FINAL1%20State%20of%20Indiana%20v%20Purdue%20Complaint%20-%20Unredacted.pdf</a>
Iowa	<a href="https://www.iowaattorneygeneral.gov/media/cms/Purdue_9419_First_Amended_Petition_E0333D49E8293.PDF">https://www.iowaattorneygeneral.gov/media/cms/Purdue_9419_First_Amended_Petition_E0333D49E8293.PDF</a>
Kansas	<a href="https://ag.ks.gov/docs/default-source/documents/kansas-v-purdue-pharma-petition.pdf?Status=Temp&amp;sfvrsn=7ff6d31a_2">https://ag.ks.gov/docs/default-source/documents/kansas-v-purdue-pharma-petition.pdf?Status=Temp&amp;sfvrsn=7ff6d31a_2</a>
Kentucky	<a href="https://ag.ky.gov/pdf_news/20171106_Complaint.pdf">https://ag.ky.gov/pdf_news/20171106_Complaint.pdf</a>
Louisiana	<a href="https://bloximages.newyork1.vip.townnews.com/theadvocate.com/c">https://bloximages.newyork1.vip.townnews.com/theadvocate.com/c</a>

	<a href="https://ontent/tncms/assets/v3/editorial/1/ca/1ca91e84-a3dd-11e7-bfed-f7fe81715ecb/59cc36d764b28.pdf.pdf">ontent/tncms/assets/v3/editorial/1/ca/1ca91e84-a3dd-11e7-bfed-f7fe81715ecb/59cc36d764b28.pdf.pdf</a>
Maine	<a href="https://www.maine.gov/tools/whatsnew/attach.php?id=1286957&amp;an=1">https://www.maine.gov/tools/whatsnew/attach.php?id=1286957&amp;an=1</a>
Maryland	<a href="https://www.marylandattorneygeneral.gov/News%20Documents/052919_Purdue_Pharma_Amended_SOC.pdf">https://www.marylandattorneygeneral.gov/News%20Documents/052919_Purdue_Pharma_Amended_SOC.pdf</a>
Massachusetts	<a href="https://www.mass.gov/files/documents/2019/07/11/43_01%20First%20Amended%20Complaint%20filed%2001-31-2019_0.pdf">https://www.mass.gov/files/documents/2019/07/11/43_01%20First%20Amended%20Complaint%20filed%2001-31-2019_0.pdf</a>
Michigan	<a href="https://www.michigan.gov/documents/ag/Opioid_Complaint_674087_7.pdf">https://www.michigan.gov/documents/ag/Opioid_Complaint_674087_7.pdf</a>
Minnesota	<a href="http://www.ag.state.mn.us/Office/Cases/PurduePharma/FirstAmendedComplaint_Final.pdf">http://www.ag.state.mn.us/Office/Cases/PurduePharma/FirstAmendedComplaint_Final.pdf</a>
Mississippi	<a href="http://www.dbslawfirm.net/wp-content/uploads/2020/04/292-Amended-Complaint-MS-MN.pdf">http://www.dbslawfirm.net/wp-content/uploads/2020/04/292-Amended-Complaint-MS-MN.pdf</a>
Missouri	<a href="https://ago.mo.gov/docs/default-source/press-releases/2019/firstamendedpetition.pdf?sfvrsn=2">https://ago.mo.gov/docs/default-source/press-releases/2019/firstamendedpetition.pdf?sfvrsn=2</a>
Montana	<a href="https://dojmt.gov/wp-content/uploads/MT-Complaint-Final-Redacted.pdf">https://dojmt.gov/wp-content/uploads/MT-Complaint-Final-Redacted.pdf</a>
Nebraska	<i>Not found</i>
Nevada	<a href="http://ag.nv.gov/uploadedFiles/agnv.gov/Content/News/PR/PR_Docs/2019/2019-06-14_State_NV_Complaint.pdf">http://ag.nv.gov/uploadedFiles/agnv.gov/Content/News/PR/PR_Docs/2019/2019-06-14_State_NV_Complaint.pdf</a>
New Hampshire	<a href="https://www.law360.com/cases/59bc3962e938f806fe000001">https://www.law360.com/cases/59bc3962e938f806fe000001</a>
New Jersey	<a href="https://nj.gov/oag/newsreleases17/NJ-Purdue-Complaint_Redacted_final.pdf">https://nj.gov/oag/newsreleases17/NJ-Purdue-Complaint_Redacted_final.pdf</a>
New Mexico	<a href="https://www.nmag.gov/uploads/PressRelease/48737699ae174b30ac51a7eb286e661f/AG_Balderas_Files_Lawsuit_Against_Opioid_Manufacturers_and_Distributors.pdf">https://www.nmag.gov/uploads/PressRelease/48737699ae174b30ac51a7eb286e661f/AG_Balderas_Files_Lawsuit_Against_Opioid_Manufacturers_and_Distributors.pdf</a>

New York	<a href="https://ag.ny.gov/sites/default/files/oag_opioid_lawsuit.pdf">https://ag.ny.gov/sites/default/files/oag_opioid_lawsuit.pdf</a>
North Carolina	<a href="https://www.law360.com/articles/997434/attachments/0">https://www.law360.com/articles/997434/attachments/0</a>
North Dakota	<a href="https://attorneygeneral.nd.gov/sites/ag/files/documents/MediaAttachments/2018-05-15-Complaint-Purdue.pdf">https://attorneygeneral.nd.gov/sites/ag/files/documents/MediaAttachments/2018-05-15-Complaint-Purdue.pdf</a>
Ohio	<a href="https://assets.documentcloud.org/documents/3761767/Ohio-opioid-drug-lawsuit.pdf">https://assets.documentcloud.org/documents/3761767/Ohio-opioid-drug-lawsuit.pdf</a>
Oklahoma	<a href="https://s3.amazonaws.com/content.newsok.com/documents/1037086440-20170630-122306-.pdf">https://s3.amazonaws.com/content.newsok.com/documents/1037086440-20170630-122306-.pdf</a>
Oregon	<a href="https://www.doj.state.or.us/wp-content/uploads/2018/09/State_v._Purdue_Complaint.pdf">https://www.doj.state.or.us/wp-content/uploads/2018/09/State_v._Purdue_Complaint.pdf</a>
Pennsylvania	<a href="https://www.attorneygeneral.gov/wp-content/uploads/2019/05/2019-05-14-Filed-Purdue-Complaint3.pdf">https://www.attorneygeneral.gov/wp-content/uploads/2019/05/2019-05-14-Filed-Purdue-Complaint3.pdf</a>
Rhode Island	<a href="http://www.riag.ri.gov/documents/StateVPurdue.pdf">http://www.riag.ri.gov/documents/StateVPurdue.pdf</a>
South Carolina	<a href="http://2hsvz0l74ah31vgcm16peuy12tz.wpengine.netdna-cdn.com/wp-content/uploads/2017/08/8-15-17-clocked-Purdue-complaint-01422887xD2C78.pdf">http://2hsvz0l74ah31vgcm16peuy12tz.wpengine.netdna-cdn.com/wp-content/uploads/2017/08/8-15-17-clocked-Purdue-complaint-01422887xD2C78.pdf</a>
South Dakota	<i>Not found</i>
Tennessee	<a href="https://www.tn.gov/content/dam/tn/attorneygeneral/documents/foi/purdue/purduecomplaint-5-15-2018.pdf">https://www.tn.gov/content/dam/tn/attorneygeneral/documents/foi/purdue/purduecomplaint-5-15-2018.pdf</a>
Texas	<a href="https://www.texasattorneygeneral.gov/sites/default/files/files/press/Purdue_Petition_5.15.18.pdf">https://www.texasattorneygeneral.gov/sites/default/files/files/press/Purdue_Petition_5.15.18.pdf</a>
Utah	<a href="https://attorneygeneral.utah.gov/wp-content/uploads/2018/05/Filed-Purdue-Complaint.pdf">https://attorneygeneral.utah.gov/wp-content/uploads/2018/05/Filed-Purdue-Complaint.pdf</a>
Vermont	<a href="https://ago.vermont.gov/wp-content/uploads/2019/05/VT-Sacklers-REDACTED-Final.pdf">https://ago.vermont.gov/wp-content/uploads/2019/05/VT-Sacklers-REDACTED-Final.pdf</a>
Virginia	<a href="http://files.constantcontact.com/bfcd0cef001/91570e6b-54bf-4cfa-">http://files.constantcontact.com/bfcd0cef001/91570e6b-54bf-4cfa-</a>

	<a href="#">bd12-267713fcc803.pdf</a>
Washington	<a href="http://agportal-s3bucket.s3.amazonaws.com/uploadedfiles/Another/News/Press_Releases/Washington%20v%20Purdue%20Complaint%209-28-17.pdf">http://agportal-s3bucket.s3.amazonaws.com/uploadedfiles/Another/News/Press_Releases/Washington%20v%20Purdue%20Complaint%209-28-17.pdf</a>
West Virginia	<a href="https://ago.wv.gov/Documents/Complaint%20signed%20not%20entered%20-%20Purdue.PDF">https://ago.wv.gov/Documents/Complaint%20signed%20not%20entered%20-%20Purdue.PDF</a>
Wisconsin	<a href="https://www.doj.state.wi.us/sites/default/files/news-media/5.16.19_Purdue_Lawsuit_Complaint.pdf">https://www.doj.state.wi.us/sites/default/files/news-media/5.16.19_Purdue_Lawsuit_Complaint.pdf</a>
Wyoming	<a href="https://www.kfbcradio.com/state-of-wyoming-announces-lawsuit-against-opioid-manufacturer/">https://www.kfbcradio.com/state-of-wyoming-announces-lawsuit-against-opioid-manufacturer/</a>

4. Forty-five of the forty-nine complaints I reviewed make no mention of the cost of special education or other school-based services.
5. Of the remaining four states, only two (Pennsylvania and Michigan) reference costs of special education or other school-based services for children with disabilities due to prenatal opioid exposure. The complaints of the other two states (Delaware and Utah) note that states incur K-12 education expenses associated with substance abuse but do not discuss prenatal opioid exposure.

*Benjamin Goldberg*

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